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**TRANSMITTAL OF NOTICE OF DEFICIENCY RESPONSES AND MODIFIED
CLOSURE PLAN INFORMATION AND DATA FOR THE NORTH AND SOUTH
SOLVENT TANKS, HAZARDOUS WASTE MANAGEMENT UNIT NUMBER 52**

01/05/1995

**DOE-0375-95
DOE-FN
8
RESPONSES**

OEPA



Department of Energy
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JAN 05 1995

DOE-0375-95

Mr. Tom Crepeau, Data Management Section
Ohio Environmental Protection Agency
Division of Hazardous Waste Management
Post Office Box 1049
Columbus, Ohio 43266-1049

Dear Mr. Crepeau:

**TRANSMITTAL OF NOTICE OF DEFICIENCY RESPONSES AND MODIFIED CLOSURE PLAN
INFORMATION AND DATA FOR THE NORTH AND SOUTH SOLVENT TANKS, HAZARDOUS WASTE
MANAGEMENT UNIT NUMBER 52**

Reference: Letter, Donald R. Schregardus to J. Phil Hameric, "Notice of
Deficiency," dated November 29, 1994

Enclosed are responses to the November 29, 1994, Notice of Deficiency and a
modified Closure Plan Information and Data (CPID) for the North and South
Solvent Tanks, Hazardous Waste Management Unit Number 52. The Notice of
Deficiency was received by our office on December 5, 1994. Changes made to
the CPID are the same as discussed with Mr. Mark Metcalf, Ohio Environmental
Protection Agency (OEPA), during the December 22, 1994, teleconference with
Fernald Environmental Restoration Management Corporation (FERMCO)
representatives.

If there are any questions regarding this submittal, please contact
John Sattler at (513) 648-3145.

Sincerely,

Wally Quaid
Walter J. Quaid
Acting Associate Director
Office of Safety & Assessment

FN:Sattler

Enclosure: As Stated

cc w/enc:

K. A. Chaney, EM-423, QO
J. A. Saric, USEPA-V
M. Metcalf, OEPA-Dayton
AR Coordinator, FERMCO

cc w/o enc:

R. Meyer, OEPA-Columbus
D. R. Schregardus, OEPA-Columbus
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M. McDermontt, DOJ
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T. D. Hagen, FERMCO/65-2
K. R. Kolthoff, FERMCO/76
D. Ofte, FERMCO/1
M. Yates, FERMCO/2
RCRA Operating Record, FERMCO/30
RCRA Closure Files, FERMCO/76

**COMMENT DISPOSITION RECORD
NORTH AND SOUTH SOLVENT TANKS - HWMU NO. 52**

Comment No.	Section	Comment	Response
1	1.5.2 Ancillary Equipment	The closure plan fails to clearly delineate the boundaries of HWMU No. 52. Please revise the closure plan with a detailed drawing which shows the tank system and ancillary equipment that is addressed by this closure plan. This information must be submitted in accordance with OAC 3745-66-12(B)(2) and 3745-66-97(A).	A drawing has been added to Section 1 (Figure 1-4 Elevation Map) of the CPID that illustrates the boundary of the tank system and ancillary equipment. Section 1.5.2 was changed to reference the drawing.
2	1.5.4 Waste Managed	The closure plan indicates that the waste from the North and South Solvent tanks were shipped off-site with wastes from other tanks. This information was offered to address why the manifest which accompanied the waste off-site also indicated that the waste stream, was hazardous for lead. However, there were no analytical for the other wastes sent off-site with the North and South Solvent Tanks. Please provide the analysis for tanks 17a, 17b, and 5b.	Section 1.5.4 has been revised to include a reference to Appendix 2. The June 1992 and March 1993 analytical data from the Tanks 17a, 17b, and 5b are included in Appendix 2, "Manifests and Certificate of Disposal - Oak Ridge, TN., AND ANALYTICAL DATA FROM TANKS 17A, 17B, AND 5B"
3	1.5.5 Soil Characterization	This section refers to a Figure 1-3 which indicates from where the four soil samples were taken, however this figure was not included in the closure plan. This information must be provided in accordance with OAC 3745-66-12(B)(4).	Figure 1-3 in the CPID was erroneously labeled Figure 3. The Figure has been modified to include the four soils samples and the correct figure number (1-3) in accordance with OAC 3745-66-12(B)(4).

COMMENT DISPOSITION RECORD
NORTH AND SOUTH SOLVENT TANKS - HWMU NO. 52

Comment No.	Section	Comment	Response
4	2.3.1.1 The Tanks	This section fails to provide information addressing the solubility of the wastes stored in the tanks with the water used to decontaminate the tank system. Please provide information which indicates that water is the proper material for decontaminating the tanks. If water is not appropriate, revise the closure plan to include a solution which is appropriate to decontaminate the tank system. This information must be provided in accordance with OAC 3745-66-12(B)(4).	The solubility of the wastes stored in the tanks and information regarding the physical extraction decontamination method has been added to Section 2.3.1. The visual inspection procedure in Section 2.3.1.1 has been expanded to include the use of a video camera.
5	2.3.1.3 Secondary Containment Structure	This section fails to provide information addressing the estimated volume of water that will be used to decontaminate the secondary containment structure. This information must be provided in accordance with OAC 3745-66-12(B)(4).	Section 2.3.1.3, Parts 1 and 2, has been revised to state that approximately 100 gallons of water will be used as an initial rinse of the secondary containment structure and another 100 gallons of water will be used to verify decontamination of the secondary containment.

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NORTH AND SOUTH SOLVENT TANKS - HWMU NO. 52

Comment No.	Section	Comment	Response
6	2.3.1.2 Ancillary Equipment	<p>This Section fails to provide detailed information regarding the decontamination of the ancillary equipment.</p> <p>Please provide a drawing indicating the location of the decontamination area.</p> <p>Revise this section to address visual inspection of the equipment after it has been rinsed to ensure that any gross contamination has been removed.</p>	<p>Section 2.3.1.2 has been revised to state that the ancillary equipment will be accumulated in the container and rinsed with water until all components are submersed.</p> <p>Figure 1-3 has been modified to include the decontamination area. This drawing is referenced in Section 2.3.1.2 of the CPID.</p> <p>The following text has been added to this Section: THE PORTALS OF THE EQUIPMENT WILL BE VISUALLY INSPECTED AFTER DECONTAMINATION TO ENSURE GROSS CONTAMINATION HAS BEEN REMOVED.</p>

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Comment No.	Section	Comment	Response
6	2.3.1.2 Ancillary Equipment	<p>Also revise part 2 of this section to indicate that the ancillary equipment will be handled as a hazardous waste until it can be demonstrated that it does not meet the definition of hazardous waste.</p> <p>This information must be provided in accordance with OAC 3745-660-12(B)(4).</p>	<p>Part 2 of this section has been revised. "The ancillary equipment PIECES will be managed as HAZARDOUS DEBRIS UNTIL IT CAN BE DEMONSTRATED THAT IT DOES NOT MEET THE DEFINITION OF HAZARDOUS DEBRIS. a solid waste (i.e., debris) after it is removed from the HWMU."</p>
	2.3.1.1 Tanks T-1S and T-2S	<p>The plan indicates that flash point and BTEX will be used to determine if the decontamination of the tanks is successful. However, for the ancillary equipment, TCLP benzene and flashpoint will be used. Please explain the discrepancy between the criteria used to determine if the ancillary equipment has been decontaminated verses the tanks.</p>	<p>Section 2.3.1.1 has been revised. "In order to characterize the debris, THE rinseate from the equipment will be sampled DIRECTLY FROM THE DECONTAMINATION CONTAINER and analyzed for flashpoint and TCLP benzene BTEX. as described in the Sampling and Analysis Plan (Appendix 6)." IF THE FLASHPOINT AND BTEX RESULTS ARE BELOW THE FINAL RINSEATE STANDARDS SHOWN IN TABLE 4-1, THE ANCILLARY EQUIPMENT PIECES WILL BE DECLARED NON-RCRA.</p>

COMMENT DISPOSITION RECORD
NORTH AND SOUTH SOLVENT TANKS - HWMU NO. 52

Comment No.	Section	Comment	Response
7	3.3 Milestone Chart	This section fails to show a detailed schedule for the closure activities. Major activities should be listed separately and estimated time-frames for start-up and completion of each activity should be provided. This information must be provided in accordance with OAC 3745-66-12(B)(4).	Table 3-1 "Milestones for the Closure Action Schedule" lists major activities separately and shows estimated time-frames for start-up and completion of each activity in accordance with OAC 3745-66-12(B)(4). Section 3.3 has been revised to include visual inspection of the North and South Solvent Tanks and the closure schedule has been changed from an 8-month duration to a 21-week duration.
8	1.5.3 Secondary Containment	This section indicates that no cracks are evident in the secondary containment area. Please provide photographs that show the condition of the secondary containment area. This information must be provided in accordance with OAC 3745-66-12.	Photographs have been added to Appendix 1 and the following text was added to Section 1.5.3 in accordance with OAC 3745-66-12: "No cracks in the secondary containment are evident (APPENDIX 1). HOWEVER, DURING CLOSURE ACTIVITIES, ANY POTENTIAL ROUTE OF RELEASE WILL BE SEALED IN ACCORDANCE WITH SECTION 2.3.1 OF THIS CPID.